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28 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

19 ANIKA OKJE ERDMANN-BROWNING and  
20 JACQUELINE BENITEZ, individually and on  
21 behalf of all others similarly situated,

22 Plaintiffs,

23 v.

24 THOMAS J. VILSACK, Secretary of the  
25 United States Department of Agriculture,  
26 in his official capacity; SHALANDA  
27 YOUNG, Director of the United States  
28 Office of Management and Budget, in her  
official capacity.

Defendants.

Case No.: 4:23-cv-04678-JST

CLASS ACTION

**DECLARATION OF CYNTHIA DE LA  
MORA IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION**

Hearing date: March 14, 2024  
Time: 2:00 p.m.

Action filed: September 12, 2023

**DECLARATION OF CYNTHIA DE LA MORA**

I, Cynthia De La Mora, declare as follows.

1. I have personal knowledge of the facts in this declaration and am competent to testify to them.

2. I am a single parent of five children.

3. I live in North Hollywood, CA.

4. My family's income comes from my earnings from In Home Supportive Services, CalWORKs, and my 12-year-old daughter who gets SSI for a disability.

5. I have not been able to get child support from my children's father.

6. I was getting \$680 in CalFresh until I was recertified in February 2024. Now I'm getting \$535 for the month. I get my benefits on the 5<sup>th</sup> of the month.

7. My work hours had gone up, so when I recertified, both my CalWORKs and CalFresh went down, and my Section 8 rent went up.

8. My very basic expenses take all my income. These include rent, utilities (electricity and gas), food over what CalFresh covers, and internet that I need for my kids to do their homework, phone, laundry and clothing. All my kids are in therapy. My daughter on SSI has to go four times a week. I need to have a car to take them. I am spending \$90 a week on gas, plus \$300 a month for car insurance, and \$700 a month for my car payment. I have two children in diapers. CalWORKs helps a little that, but not enough to pay for all of them. I also have to buy wipes for them, and for my disabled daughter, as she can't use toilet paper and I have to clean her. She has a lot of other personal needs that I need to use the SSI on.

9. When I was getting \$686, the CalFresh would get me through the first two weeks, and then I had to pay cash. With the \$535 I get now, it only lasts a week and a half. I now have to go from food pantry to food pantry to try to get enough at the end of the month. But that comes at a cost – extra gas for the trips and paying someone to watch my little children who can't wait hours in line. It's also really hard on me physically to line up like that, due to my autoimmune disease. Also, they only have fresh food, no non-perishables and I've never been able to get proteins.

DocuSigned by:  
  
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Cynthia De La Mora